

MEMO ENDORSED

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January 20, 2021

Via ECF

Honorable Andrew Carter
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

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Re: *United States v. Larry Smith*, 18 Cr. 420

Dear Judge Carter:

This firm represents Larry Smith in the above-captioned matter. As you may recall, Mr. Smith was released on bond in April 2020 due to the COVID-19 pandemic. We write now to request to modify the conditions of Mr. Smith's release.

At the time Mr. Smith was released, one of the conditions of his bond was home incarceration. We write to respectfully request that the Court modify this condition by requiring a curfew, with hours to be determined by pre-trial services, rather than home incarceration. Mr. Smith requests this modification so that he may help his fiancé, with whom he resides, care for their son by taking him to school and picking him up. In addition, this modification would allow Mr. Smith to further pursue his GED and seek employment so that he may assist his family financially.

I have spoken with Mr. Smith's pretrial services officer, Officer Mohammed Ahmed. Officer Ahmed reports that since the time of Mr. Smith's release, Mr. Smith has fully complied with all of the conditions of his release and is in regular contact with Officer Ahmed. Officer Ahmed also stated that he has no concerns about this proposed modification and has no objection to this application. I have also spoken to AUSA Christopher Clore who informed me that he has no objection to this application.



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For the foregoing reasons, we respectfully request that the Court modify the conditions of Mr. Smith's bond by requiring a curfew, with hours to be determined by pretrial services, rather than home incarceration.

Respectfully submitted,

Ellen M. Murphy

**The application is granted.
So Ordered.**

A handwritten signature in black ink that reads "Andrew Carter". To the right of the signature is a date stamp that reads "1/21/21".

cc: AUSA Christopher Clore (*via ECF*)
Gregory Morvillo, Esq. (*via ECF*)
Officer Mohammed Amed (*via email*)